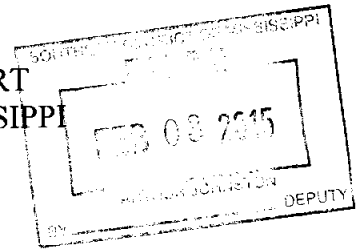


IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 15CR 9 HSO-566

HERMAN MCGEE, JR.  
MICHAEL LAMAR RICKS  
KERIYAE JUDEKQA SIMMONS  
JALYN NICOLE HOLLAND

21 U.S.C. § 846  
21 U.S.C. § 841(a)(1)  
18 U.S.C. § 922(o)  
18 U.S.C. § 924(c)  
18 U.S.C. § 1952(a)(3)

**The Grand Jury charges:**

COUNT 1

Beginning on a date unknown but prior to November 1, 2014, and continuing through January 2015, in Harrison County in the Southern Division of the Southern District of Mississippi and elsewhere, the defendants, **HERMAN MCGEE, JR., MICHAEL LAMAR RICKS, KERIYAE JUDEKQA SIMMONS and JALYN NICOLE HOLLAND**, aided and abetted by each other and others known and unknown to the Grand Jury, did knowingly conspire with each other, and with other persons known and unknown to the Grand Jury, to commit offenses against the United States, as prohibited by Section 841(a)(1), Title 21, United States Code, that is to say, they conspired to possess with intent to distribute controlled substances.

It was part of the conspiracy that they conspired to possess with intent to distribute at least 500 grams or more of a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance as prohibited by Section 841(a)(1), Title 21, United States Code.

It was further part of the conspiracy that they conspired to attempt to possess with intent to distribute a controlled substance, which offense involved a detectable amount of marihuana, a

Schedule I Controlled Substance as prohibited by Section 841(a)(1), Title 21, United States Code.

All in violation of Section 846, Title 21, United States Code and Section 2, Title 18 United States Code.

COUNT 2

On or about January 9, 2015, in Harrison County in the Southern Division of the Southern District of Mississippi and elsewhere, the defendants, **HERMAN MCGEE, JR., MICHAEL LAMAR RICKS, KERIYAE JUDEKQA SIMMONS and JALYN NICOLE HOLLAND**, did knowingly and intentionally possess with intent to distribute at least 500 grams or more of cocaine hydrochloride, a Schedule II controlled substance.

In violation of Section 841(a)(1), Title 21, and Section 2, Title 18, United States Code.

COUNT 3

On or about January 9, 2015, in Harrison County in the Southern Division of the Southern District of Mississippi and elsewhere, the defendants **HERMAN MCGEE, JR. and MICHAEL LAMAR RICKS**, did knowingly conspire with each other and with other persons known and unknown to the Grand Jury, during and in relation to a drug trafficking crime, to use and carry firearms during and in relation to a drug trafficking crime, and possess firearms in furtherance of the drug trafficking crime, to wit: a conspiracy to possess with the intent to distribute cocaine hydrochloride, a drug controlled substance.

All in violation of Sections 924(o), Title 18, United States Code.

COUNT 4

Beginning on a date unknown but prior to November 1, 2014, and continuing through January 9, 2015, in Harrison County in the Southern Division of the Southern District of Mississippi and elsewhere, the defendants, **HERMAN MCGEE, JR. and MICHAEL LAMAR RICKS**, did knowingly carry and use a firearm, during and in relation to a drug trafficking

crime, and possess in furtherance of a drug trafficking crime, for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine hydrochloride as prohibited by Section 841, Title 21, United States Code.

In violation of Sections 924(c)(1)(A) and 2, Title 18, United States Code.

COUNT 5

On or about January 9, 2015, in Harrison County in the Southern Division of the Southern District of Mississippi and elsewhere, the defendants, **MICHAEL LAMAR RICKS**, **KERIYAE JUDEKQA SIMMONS** and **JALYN NICOLE HOLLAND**, did travel and did aid and abet others in traveling in interstate commerce from the State of Texas to the State of Mississippi, and elsewhere, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment and carrying on of an unlawful activity, the unlawful activity being a business enterprise involving the distribution of a controlled substance, that is cocaine hydrochloride, and thereafter did perform acts and attempt to perform acts to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of the unlawful activity.

In violation of Sections 1952(a)(3) and 2, Title 18, United States Code.

**NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE**

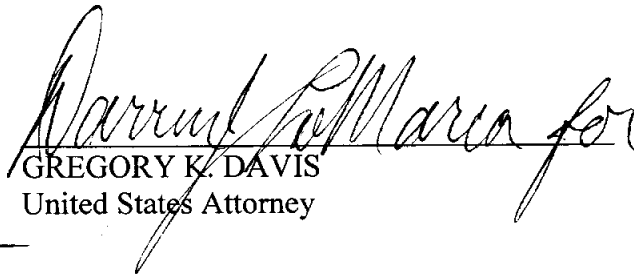
As a result of committing the offenses as alleged in this indictment, the defendants shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses.

The grand jury has determined that probable cause exists to believe that the following property is subject to forfeiture as a result of one or more of the offenses alleged in this indictment:

One Ruger, serial number 66434233, Model P-345:  
And all ammunition; and  
2008 Chevrolet Impala, VIN 2G1WT55N581258039

Further, if any property described above, as a result of any acts or omissions of the defendants: (a) cannot be located upon exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendants, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Section 924(d)(1), Title 18, United States Code, Section 981(a)(1)(c), Title 18, United States Code, Section 853, Title 21, United States Code, and Section 2641, Title 28, United States Code.

  
GREGORY K. DAVIS  
United States Attorney

A TRUE BILL.

s/signature redacted  
Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 3rd day of February, 2015.

  
UNITED STATES MAGISTRATE JUDGE